

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BLAKE DONEGAN, by and through his mother, )  
ANGELA DONEGAN, ANTONIO CAMPBELL, )  
by and through his mother, SHANEATHA ROLLING, )  
JANELLE EATON, by and through her mother, )  
JACQUELINE EATON and KINA WINES, by )  
and through her mother, SHARON QUINN, )  
individually and on behalf of a class, ) No. 16-11178  
)  
Plaintiffs, ) Judge: Robert M. Dow, Jr.  
)  
vs. ) Magistrate: Sheila Finnegan  
)  
PATRICIA R. BELLOCK, in her official capacity )  
as Director of the Illinois Department of )  
Healthcare and Family Services, )  
)  
Defendant. )

**JOINT MOTION FOR PRELIMINARY APPROVAL  
OF SETTLEMENT AGREEMENT AND NOTICE PLAN**

Plaintiffs, on behalf of themselves and all others similarly situated (“Plaintiffs”), and Defendant Patricia R. Bellock, in her official capacity (collectively, “the Parties”), jointly move this Court for an Order: (1) preliminarily approving the proposed Settlement Agreement (attached as Exhibit A); (2) approving the form and method of providing notice of the Settlement Agreement (the “Notice Plan,” with the proposed actual notice, attached as Exhibit “B”), and (3) setting dates for the filing of objections to the Settlement Agreement, written responses to any objections, and a fairness hearing regarding the Settlement Agreement consistent with the proposed form of order (attached as Exhibit C).

For the reasons set forth in the Parties Memorandum in Support of Joint Motion for Preliminary Approval of Settlement Agreement and Approval of Notice Plan, the Parties respectfully request that this Motion be granted.

Dated: January 17, 2019

Respectfully submitted,

**For Plaintiffs**

By: /s/ Robert H. Farley, Jr.

Robert H. Farley, Jr.  
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**For Defendant**

By: /s/ Michael D. Arnold

Michael D. Arnold  
Assistant Attorney General  
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**CERTIFICATE OF SERVICE**

I, Robert H. Farley, Jr., Attorney for Plaintiffs, deposes and states that he will cause the foregoing Joint Motion for Preliminary Approval of Settlement Agreement and Notice Plan by electronically filing said document with the Clerk of the Court using the CM/ECF system, this 17<sup>th</sup> day of January, 2019.

*/s/ Robert H. Farley, Jr.*  
Robert H. Farley, Jr.